

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. C-1-02-431
Plaintiff,	:	(Judge Spiegel)
vs.	:	
REAL PROPERTY KNOWN AND	:	
NUMBERED AS 9550 SHORE DRIVE,	:	
UNITS 839A and 839B, SANDS OCEAN	:	<u>STIPULATION EXTENDING</u>
CLUB III, MYRTLE BEACH, HORRY	:	<u>CLAIMANT'S TIME TO FILE</u>
COUNTY, SOUTH CAROLINA, WITH ALL	:	<u>ANSWER</u>
APPURTENANCES, IMPROVEMENTS,	:	
AND ATTACHMENTS THEREON,	:	
Defendant.	:	

The parties to the above-captioned matter hereby agree and stipulate, by and through their respective undersigned counsel, that the Claimant, Richard W. Erpenbeck, in the above-titled action shall have an additional sixty (60) day extension, up to and including November 22, 2004, in which to answer the Complaint For Forfeiture In Rem filed by the United States of America against the property to which he is the titled owner. This in addition to the previous extensions by stipulation from the date on which his Proof of Claim was filed.

The parties further agree to stipulate that the basis for this extension is continuing negotiations and cooperation by the Claimant in resolving this matter and other related government investigations.

/s/ Thomas D. Heekin, Jr.

Thomas D. Heekin, Jr. (#0040784)

Attorney for Claimant

Richard W. Erpenbeck

Heekin & Heekin

817 Main Street, Suite 200

Cincinnati, Ohio 45202

PH: (513) 345-5560

FAX: (513) 345-5565

/s/Kathleen Brinkman

Kathleen Brinkman

Assistant United States Attorney

221 East Fourth Street, Suite 400

Cincinnati, Ohio 45202